

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee**

<b>In Re:</b>	)	
	)	
<b>Petition for Arbitration of ITC^DeltaCom</b>	)	<b>Docket No. 03-00119</b>
<b>Communications, Inc. with BellSouth</b>	)	
<b>Telecommunications, Inc. Pursuant to the</b>	)	
<b>Telecommunications Act of 1996</b>	)	

**ITC^DELTACOM COMMUNICATION INC.'S FIRST SET OF  
INTERROGATORIES TO BELL SOUTH**

ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom ("ITC^DeltaCom") hereby serves upon BellSouth Telecommunications, Inc. ("BellSouth") the following written interrogatories to be answered under oath by an officer or agent of BellSouth on or before July 2, 2003.

**INSTRUCTIONS FOR USE AND DEFINITIONS**

1. All information is to be divulged which is in the possession of BellSouth, its attorneys, investigators, agents, employees, or other representatives of BellSouth and/or its attorneys.
2. Where an Interrogatory calls for an answer which involves more than one part, each part of the answer should be clearly set out so it is understandable.
3. In the event the space provided on the form of Interrogatories is not sufficient for your answer to any of the Interrogatories, please attach a labeled, separate sheet of paper with the additional information.
4. These Interrogatories are intended as continuing Interrogatories, requiring you to supplement your answer, setting forth any information within the scope of the

Interrogatories that may be acquired by you, your agents, your attorneys, or representatives at any time following the date of your original answer.

5. "State all facts" or "state the factual basis" means to set forth in writing and in detail every fact, opinion, assumption, belief, hypothesis, and theory, concerning or relating to the matter inquired about in the Interrogatory, whether these are matters of your own observation and actual knowledge, or are matters which you have become aware of through some other means or through some other person. It furthermore means to set forth in writing in detail how and when you came to observe or have actual knowledge of the matter and how and when you became aware of the matter through some other means or person. It also means to identify all such persons through whom you became aware of the matters.
6. When used with reference to natural persons, the word "identify" or "identity" or the phrase "give the identity of" means to state his or her full name, present or last-known address, present or last-known employer, present or last-known telephone number, occupation or profession, and the capacity in which he or she has ever been affiliated with BellSouth.
7. When used with reference to a document, the word "identify" or "identity" or the phrase "give the identity of" means to state the type of document to which the Interrogatory is addressed (i.e., correspondence, memoranda, notes, etc.); its title or other means of identification; its author's identity; its date; the identity of all recipients of the document (whether the document is addressed to such recipient or merely copied to such recipient); all dates and places of recording or filing with any court, commission, or public agency; the book and page number, or cause

number, and all other information reflecting recordation or filing; the present location and identity of the custodian of the original document; the present location and identity of all the persons having a copy of such document; and whether such original or copy of the document is presently in your possession or control, and, if it is not, what disposition was made of it. In the alternative, the document(s) in question may be attached to the answer to that particular Interrogatory.

8. "Documents" is to be construed in the broadest possible sense and means any tangible thing, recording and reproduction, whether visual, auditory or digital in BellSouth's possession, control, or custody, including without limiting the generality of its meaning, correspondence, pleadings, reports, depositions, personal memoranda, memoranda to files, inter-office memoranda, intra-office memoranda, drawings, prints, graphs, charts, photographs, phonographs, notes, studies, valuations, analyses, reports (whether expert or otherwise), reviews, working papers, books, notes, telegrams, pamphlets, video or audio tapes, voice recordings, computer tapes, printouts or cards, microfilms, microfiches, and any papers or items on which words have been written, printed, typed, or otherwise affixed, and shall mean a copy when the original is not in the possession, control, or custody of BellSouth, and shall mean every copy of every document when such a copy is not an identical copy of an original.
9. "Person" shall mean and is defined as any natural person, proprietorship, association, partnership, corporation or any business entity, to include in the singular as well as the plural.

10. "You" or "yours" means BellSouth and any agents or employees thereof.
11. An objection of attorney-client privilege or work-product in response to an Interrogatory or Document Request is not an excuse for a complete failure to respond. If you have such an objection, you are instructed to state fully the grounds for such objections, specifying, in the case of attorney-client privilege: (1) what type of communication is involved (letter, oral communication, memorandum, etc.), (2) the identities of all persons who are or were ever privy to the contents of such communications, (3) the general subject matter of the communication, (4) the date of and place where the communication was made, and (5) the general nature of the subject matter of the legal advice that was being sought or rendered, during the course of which such communication took place; and in the case of work-product privilege: (1) the identity of the attorney or person acting at the request or counsel who developed the work-product, (2) what the form of the work product is (letter, memorandum, etc.), (3) the identity of all persons who ever have been privy to the contents of such work-product, (4) the date it was prepared, (5) what litigation it was prepared in anticipation of, and (6) the basis for your contention that it was "prepared in anticipation of litigation." Where such a privilege is asserted as to any document, you are instructed to prepare and submit to this defendant a list of all such documents together with the information supporting the claim of privilege and the identity of all such documents should be included as a part of your response to the requests for production of documents.
12. Identify the individual(s) responding to each interrogatory.

13. All of the following Interrogatories contain a presumed but unstated request to identify any documents that support your answer(s).

### **INTERROGATORIES**

**NOTE: Please identify any documents that support your answers to the following interrogatories as part of your answers.**

1. Identify which of the eight alternatives for UNE combinations discussed in Mr. Milner's testimony filed in Georgia successfully avoid additional analog to digital conversions. (a) For those alternatives that do successfully avoid the additional analog to digital conversions, what percentage of customers in Tennessee could be served via these alternatives?
2. Explain in detail why BellSouth cannot technically provide an IDLC compatible loop to ITC^DeltaCom without additional Analog to Digital conversions.
3. Does BellSouth have agreements with its vendors that include terms longer than three years?
4. Is BellSouth aware of any other ILEC that has interconnection agreements with CLECs that have a term longer than 3 years? If so, please identify such ILEC(s).
5. Under what circumstances does BellSouth charge a CLEC an Access Daily Usage File record fee?
6. Does BellSouth charge a CLEC an ADUF charge for local calls?
  - a). If yes, is it BellSouth's contention that BellSouth sought and obtained approval from the Tennessee Regulatory Authority to charge ADUF fees on local calls?
  - b). Provide citations to orders where such specific approval to apply an ADUF charge to a local call was approved by the Tennessee Regulatory Authority.

- (c ) Describe how a "duplicate" call gets placed on the ADUF. What percentage of these duplicates are local?
7. Please explain the purpose of the ADUF record.
  8. How many ADUF billing disputes are pending in the BellSouth region?
  9. Can a call record appear on both the ADUF and ODUF files such that the CLEC is charged for both records?
  10. For non-CABs billing, how do BellSouth's mechanized systems calculate backbilling with regard to usage, rate changes, nonrecurring and recurring charges?
  11. How long does BellSouth maintain historical files to support its backbilling?
  12. What areas of the backbilling process are manual or mechanized for BellSouth?  
How large of a staff (employee and independent contractor resources) does BellSouth employ to support the manual backbilling processes?
  13. How much money has BellSouth backbilled ITC^DeltaCom as of May 1, 2003 for the state of Tennessee for services related to the parties interconnection agreement? If BellSouth does not have this information available by state, please provide the dollar amount that BellSouth has backbilled ITC^DeltaCom for the region as of May 1, 2003.
  14. To the extent BellSouth has notified ITC^DeltaCom as of May 1, 2003 that it intends to backbill ITC^DeltaCom but has not yet rendered an invoice for those amounts, please provide that backbilling amount.
- (a). Please indicate the period of time that BellSouth is backbilling ITC^DeltaCom for the amounts provided in response to this Interrogatory.

15. For the state of Tennessee, how many years does BellSouth backbill ITC^DeltaCom ?
16. Does BellSouth send ITC^DeltaCom Local Service Requests (LSRs)?
17. Does BellSouth pay any fees to ITC^DeltaCom when ITC^DeltaCom works those LSRs?
18. How does BellSouth report OSS income on BellSouth's financial statements?
19. How much did BellSouth spend for OSS enhancements for each year beginning in 1999 to 2002?
20. How much does BellSouth anticipate it will spend on OSS enhancements for 2003 and 2004?
21. Of the spending for OSS enhancements between 1999 and 2002, what portion was spent on OSS enhancements requested by CLECs?
22. How much has BellSouth spent on correcting defective code?
23. Is BellSouth compensated by its vendors for defective code or the late delivery of code? If yes, as a result of defective code, how much did BellSouth collect in 2002?
24. How many OSS defects currently exist?
25. How long have these OSS defects been "pending" or identified?
26. When does BellSouth plan to correct these OSS defects?
27. Does BellSouth flow through any payments from its vendors for defective code back to CLECs?

28. Please explain why BellSouth chooses to disconnect a consumer's ADSL service when that consumer chooses ITC^DeltaCom for local service and ITC^DeltaCom provides the local service via UNE-P.
29. Describe any "operational" issues that BellSouth believes it must overcome when xDSL service is provided over a UNE-P loop owned by a CLEC.
- (a) Does BellSouth admit that 24 ITC^DeltaCom end users who were provided xDSL for many months without any apparent operational issues? If not, explain in detail.
  - (b) Does Bell South do business with xDSL providers other than its own? Are these ISPs not billed today?
  - (c) Do BellSouth systems track CLEC's Interconnection Agreements today?
  - (d) Is OCN used to determine what service a CLEC can request and would xDSL not follow this same process?
  - (e) Does BellSouth provide xDSL service to its retail end user having measured service?
30. Has anyone filed an antitrust lawsuit against BellSouth regarding the tying of BellSouth's ADSL service to its local service?
31. Has any state commission ordered BellSouth to continue providing its wholesale or retail ADSL service to the consumer where the consumer has another provider for local service? If yes, list those state commissions and provide the docket or order numbers.
32. Is BellSouth aware of any state commissions outside of the BellSouth region that have addressed the issue of an RBOC or ILEC tying its ADSL service to its local



service? If yes, list those state commissions and provide the docket or order number.

33. Why is hunting not allowed between UNE-P and resale lines?
34. If BellSouth backbills ITC^DeltaCom in March of 2003 for services or elements ordered in 2000 but were not billed due to BellSouth error, does BellSouth make performance payments or adjustments?
35. When BellSouth finds a billing error and backbills CLECs, does BellSouth apply an adjustment to performance penalty payments to all CLECs or only those reporting?
36. How does BellSouth determine which month to apply the adjustment to the performance measure for the billing error?
37. Has BellSouth ever billed ITC^DeltaCom a line item called "Charge for Processing Change in Service." If yes, under what circumstances?
38. In its contracts with its vendors, does BellSouth have a time limit on backbilling charges? If yes, what are those time limits?
39. Does BellSouth have any interconnection agreements with any CLEC, ILEC, affiliate or any other carrier that provide a time limit on backbilling of charges (e.g. 6 months or 12 months ) ? If yes, identify that BellSouth agreement and the time limit.
40. Does BellSouth have any agreement other than an interconnection agreement with any ILEC, affiliate or other carrier that provides a time limit on backbilling? If yes, identify that agreement.

41. Does BellSouth use the manual process described to validate its retail customer listings?
42. Do BellSouth's retail systems sequence orders, or use the SEQ FID? Is this available to CLECs?
43. How many complaints from CLECs has BellSouth received regarding inaccurate directory listings for the year 2002?
44. What percent of BellSouth's business retail listings are dropped from the directory in error and what percent of BellSouth's residential retail listings are dropped from the directory in error?
45. What percent of BellSouth's retail white page listings have corrections?
46. How many BellSouth retail business customer complaints were received regarding inaccurate directory listings for the year 2002?
47. Describe the process used by BellSouth to arrive at the "market rate" of \$14.00 (the recurring charge for a port labeled as "market rate").
48. Identify the business analysis or cost studies undertaken by BellSouth perform to develop its proposed market rates.
49. Has BellSouth received complaints (formal and informal) from CLECs regarding the lack to timeliness of BellSouth's billing? If yes, identify those complaints.
50. Refer to the Subsequent Application Fee and the "Administrative Only Application Fee" (USOC PE1BL) is it BellSouth's position that these fees are cost-based?
  - a. If no, describe in detail the basis for this charge and explain how the rates were developed.

b. If yes, provide a copy of BellSouth's most current cost analysis of these rates and their underlying functionality. Include the following information in your response:

(i) a complete description of all work activities that must be performed by BellSouth as a direct result of a request by ITC^DeltaCom "to modify the use of the Collocation space."

(ii) a complete explanation of why each work activity listed in response to part (i) is necessary and must be performed whenever ITC^DeltaCom makes such a request.

(iii) a description of each category or classification of employee that is needed to perform each work activity list in response to part (i).

(iiii) the loaded labor rate associated with each category or classification of employee that is needed to perform each work activity list in response to part (i), and a complete description of the development of each loaded labor rate, including all inputs and assumptions.

(v) The probability that each work activity listed in response to part (i) will be necessary whenever ITC makes a request to BellSouth "to modify the use of the Collocation space" and a complete description of how these probabilities were calculated (including a list of all assumptions underlying each probability).

(vi) The estimated time required to perform each work activity listed in response to part (i), and a complete description of how these work times were calculated (including a list of all assumptions underlying each work time).

(vii) A complete listing of any non-labor costs that are included in this charge, and a detailed description of how these costs were developed. For purposes of this request, "non-labor costs" is intended to mean any cost other than direct labor costs, including but not limited to material costs, other expenses, shared costs, and common costs.

(viii) A listing of all Job Function Codes ("JFCs") associated with the labor costs included. For each JFC, provide the following for the most recent time period available:

- "Direct Labor - Productive" Annual Dollars
- "Direct Labor - Premium" Annual Dollars
- "Direct Labor - Other Employee" Annual Dollars
- "Direct Labor - Annual Paid Absence" Annual Dollars
- "Direct Labor - Direct Administration" Annual Dollars
- "Direct Labor - Other Cost" Annual Dollars
- "Directly Assigned Benefits" Annual Dollars
- Total Annual Hours

(ix) For each JFC identified in response to part (viii), provide BellSouth's projected level of labor inflation and state the time period for which this projection applies.

(x) A functioning copy of all cost models, electronic spreadsheets, or other electronic files used by BellSouth to develop these costs. These files should contain the inputs and assumptions used by BellSouth in its most recent cost analysis.

51. Does BellSouth permit CLECs to submit an LSR by any means other than a through a BellSouth mechanized OSS system?

a. If yes, provide a copy of BellSouth's most current cost analysis of the cost it incurs to process such a request. If BellSouth currently permit CLECs to submit an LSR by more than one means (other than a through a BellSouth mechanized OSS system) provide a complete cost analysis for each permitted method. Include the following information in your response:

(i) a complete description of all work activities that must be performed by BellSouth as a direct result of the submission of an LSR by a CLEC via the permitted non-mechanized method.

(ii) a complete explanation of why each work activity listed in response to part (i) is necessary and must be performed whenever a CLEC submits such a request.

(iii) a description of each category or classification of employee that is needed to perform each work activity list in response to part (i).

(iiii) the loaded labor rate associated with each category or classification of employee that is needed to perform each work activity list in response to part (i), and a complete description of the development of each loaded labor rate, including all inputs and assumptions.

(v) The probability that each work activity listed in response to part (i) will be necessary whenever a CLEC submits such a request and a complete description of how these probabilities were calculated (including a list of all assumptions underlying each probability).

(vi) The estimated time required to perform each work activity listed in response to part (i), and a complete description of how these work times were calculated (including a list of all assumptions underlying each work time).

(vii) A complete listing of any non-labor costs that are included in this charge, and a detailed description of how these costs were developed. For purposes of this request, "non-labor costs" is intended to mean any cost other than direct labor costs,

including but not limited to material costs, other expenses, shared costs, and common costs.

(viii) A listing of all Job Function Codes ("JFCs") associated with the labor costs included. For each JFC, provide the following for the most recent time period available:

- "Direct Labor – Productive" Annual Dollars
- "Direct Labor – Premium" Annual Dollars
- "Direct Labor – Other Employee" Annual Dollars
- "Direct Labor – Annual Paid Absence" Annual Dollars
- "Direct Labor – Direct Administration" Annual Dollars
- "Direct Labor – Other Cost" Annual Dollars
- "Directly Assigned Benefits" Annual Dollars
- Total Annual Hours

(ix) For each JFC identified in response to part (viii), provide BellSouth's projected level of labor inflation and state the time period for which this projection applies.

(x) A functioning copy of all cost models, electronic spreadsheets, or other electronic files used by BellSouth to develop these costs. These files should contain the inputs and assumptions used by BellSouth in its most recent cost analysis.

b. If no, has BellSouth ever permitted CLECs to submit an LSR by any means other than a through a BellSouth mechanized OSS system? If the answer to this question is anything other than an unqualified "no", provide the following information. If BellSouth has previously permitted CLECs to submit an LSR by more than one means (other than a through a BellSouth mechanized OSS system) provide a complete cost analysis for each previously permitted method. Include the following information in your response:

(i) a complete description of all work activities that must be performed by BellSouth as a direct result of the submission of an LSR by a CLEC via the permitted non-mechanized method.

(ii) a complete explanation of why each work activity listed in response to part (i) is necessary and must be performed whenever a CLEC submits such a request.

(iii) a description of each category or classification of employee that is needed to perform each work activity list in response to part (i).

(iiii) the loaded labor rate associated with each category or classification of employee that is needed to perform each work activity list in response to part (i), and a complete description of the development of each loaded labor rate, including all inputs and assumptions.

(v) The probability that each work activity listed in response to part (i) will be necessary whenever a CLEC submits such a request and a complete description of how these probabilities were calculated (including a list of all assumptions underlying each probability).

(vi) The estimated time required to perform each work activity listed in response to part (i), and a complete description of how these work times were calculated (including a list of all assumptions underlying each work time).

(vii) A complete listing of any non-labor costs that are included in this charge, and a detailed description of how these costs were developed. For purposes of this request, "non-labor costs" is intended to mean any cost other than direct labor costs, including but not limited to material costs, other expenses, shared costs, and common costs.

(viii) A listing of all Job Function Codes ("JFCs") associated with the labor costs included. For each JFC, provide the following for the most recent time period available:

- "Direct Labor – Productive" Annual Dollars
- "Direct Labor – Premium" Annual Dollars
- "Direct Labor – Other Employee" Annual Dollars
- "Direct Labor – Annual Paid Absence" Annual Dollars
- "Direct Labor – Direct Administration" Annual Dollars
- "Direct Labor – Other Cost" Annual Dollars
- "Directly Assigned Benefits" Annual Dollars
- Total Annual Hours

(ix) For each JFC identified in response to part (viii), provide BellSouth's projected level of labor inflation and state the time period for which this projection applies.

(x) A functioning copy of all cost models, electronic spreadsheets, or other electronic files used by BellSouth to develop these costs. These files should contain the inputs and assumptions used by BellSouth in its most recent cost analysis.

52. Describe in detail the basis for the "Charge for Processing Change in Service" (or as referenced by BellSouth Secondary Service Charge) line item billed to ITC^DeltaCom by BellSouth.

53. Is the rate for the "Charge for Processing Change in Service" (or Secondary Service Charge as referenced in BellSouth's response to ITC^DeltaCom's arbitration petition) line item billed to ITC^DeltaCom by BellSouth cost-based?

a. If yes, provide a copy of BellSouth's most current cost analysis of the cost it incurs to provide the functionality and tasks associated with the "Charge for Processing Change in Service" line item billed to ITC^DeltaCom. Include the following information in your response:

(i) a complete description of all work activities that must be performed by BellSouth as a direct result of BellSouth performing the functionality and tasks associated with the "Charge for Processing Change in Service" line item billed to ITC^DeltaCom.

(ii) a complete explanation of why each work activity listed in response to part (i) is necessary and must be performed.

(iii) a description of each category or classification of employee that is needed to perform each work activity list in response to part (i).

(iii) the loaded labor rate associated with each category or classification of employee that is needed to perform each work activity list in response to part (i), and a complete description of the development of each loaded labor rate, including all inputs and assumptions.

(v) The probability that each work activity listed in response to part (i) will be necessary and a complete description of how these probabilities were calculated (including a list of all assumptions underlying each probability).

(vi) The estimated time required to perform each work activity listed in response to part (i), and a complete description of how these work times were calculated (including a list of all assumptions underlying each work time).

(vii) A complete listing of any non-labor costs that are included in this charge, and a detailed description of how these costs were developed. For purposes of this request, "non-labor costs" is intended to mean any cost other than direct labor costs, including but not limited to material costs, other expenses, shared costs, and common costs.

(viii) A listing of all Job Function Codes ("JFCs") associated with the labor costs included. For each JFC, provide the following for the most recent time period available:

"Direct Labor – Productive" Annual Dollars

"Direct Labor – Premium" Annual Dollars

"Direct Labor – Other Employee" Annual Dollars

"Direct Labor – Annual Paid Absence" Annual Dollars

"Direct Labor – Direct Administration" Annual Dollars

"Direct Labor – Other Cost" Annual Dollars

"Directly Assigned Benefits" Annual Dollars

Total Annual Hours

(ix) For each JFC identified in response to part (viii), provide BellSouth's projected level of labor inflation and state the time period for which this projection applies.

(x) A functioning copy of all cost models, electronic spreadsheets, or other electronic files used by BellSouth to develop these costs. These files should contain the inputs and assumptions used by BellSouth in its most recent cost analysis.

b. If no, describe in detail the basis for this charge and explain how the rate was developed.

c. Identify any complaints or lawsuits filed against BellSouth with regard to the billing of this charge and any resolutions or settlements reached.

54. Provide a listing of any and all rates for UNEs that have not previously been approved by this Authority.

a. For each UNE rate identified, provide a complete description of the UNE.

b. For all nonrecurring UNE rates identified, provide the following information:

(i) a complete description of all work activities that must be performed by BellSouth as a direct result of BellSouth performing the functionality and tasks associated with the UNE.

(ii) a complete explanation of why each work activity listed in response to part (i) is necessary and must be performed.

(iii) a description of each category or classification of employee that is needed to perform each work activity list in response to part (i).

(iiii) the loaded labor rate associated with each category or classification of employee that is needed to perform each work activity list in response to part (i), and a complete description of the development of each loaded labor rate, including all inputs and assumptions.

(v) The probability that each work activity listed in response to part (i) will be necessary and a complete description of how these probabilities were calculated (including a list of all assumptions underlying each probability).

(vi) The estimated time required to perform each work activity listed in response to part (i), and a complete description of how these work times were calculated (including a list of all assumptions underlying each work time).



(vii) A complete listing of any non-labor costs that are included in this charge, and a detailed description of how these costs were developed. For purposes of this request, "non-labor costs" is intended to mean any cost other than direct labor costs, including but not limited to material costs, other expenses, shared costs, and common costs.

(viii) A listing of all Job Function Codes ("JFCs") associated with the labor costs included. For each JFC, provide the following for the most recent time period available:

- "Direct Labor – Productive" Annual Dollars
- "Direct Labor – Premium" Annual Dollars
- "Direct Labor – Other Employee" Annual Dollars
- "Direct Labor – Annual Paid Absence" Annual Dollars
- "Direct Labor – Direct Administration" Annual Dollars
- "Direct Labor – Other Cost" Annual Dollars
- "Directly Assigned Benefits" Annual Dollars
- Total Annual Hours

(ix) For each JFC identified in response to part (viii), provide BellSouth's projected level of labor inflation and state the time period for which this projection applies.

(x) A functioning copy of all cost models, electronic spreadsheets, or other electronic files used by BellSouth to develop these costs. These files should contain the inputs and assumptions used by BellSouth in its most recent cost analysis.

c. For all the recurring UNE rates identified, provide the following information:

(i) A complete description of the methodology used to calculate the cost.

(ii) A complete listing of all investments, both direct and indirect, associated with the UNE and a description of the methodology used to calculate those investments.

(iii) A complete listing of all annual charge factors, loading factors, or any other factors applied to those investments and a description of the methodology used to develop those factors.

(iv) A functioning copy of all cost models, electronic spreadsheets, or other electronic files used by BellSouth to develop these costs. These files should contain the inputs and assumptions used by BellSouth in its most recent cost analysis.

55. For the Order Modification Charges referenced in Attachment 2, (Issue 54),

provide a listing of each FCC tariffed rate that may apply. For each FCC tariffed

rate or rate element identified, indicate whether the rate is cost-based.

(a) For any rate or rate element that BellSouth does not contend is cost-based, describe in detail the basis for this charge and explain how the rate was developed.

(b) Provide a copy of any and supporting documentation provided to the FCC by BellSouth when the rates or rate elements were filed that was intended to support the reasonableness of the rate. To clarify, DeltaCom is seeking all support for the specific rates that BellSouth seeks to reference in the interconnection agreement with DeltaCom, and is not seeking a copy of the support for all other proposed rates that may have been included in the same FCC filing.

(c) Did the FCC initiate an investigation of these rates? If no, provide a complete explanation of why BellSouth believes the rates are reasonable. If yes, provide a citation to the FCC's investigation.

(d) If the answer to part (c) is yes, describe in detail BellSouth's understanding of the standard applied by the FCC when conducting this investigation.

(e) For each rate or rate element that BellSouth contends is cost-based, indicate the type of cost (e.g. TELRIC, embedded cost, other) that BellSouth contends that the rate represents.

(f) For each rate or rate element that BellSouth contends is cost-based provide the following information:

(i) a complete description of all work activities that must be performed by BellSouth as a direct result of BellSouth performing the functionality and tasks associated with the FCC tariffed rate.

(ii) a complete explanation of why each work activity listed in response to part (i) is necessary and must be performed.

(iii) a description of each category or classification of employee that is needed to perform each work activity list in response to part (i).

(iiii) the loaded labor rate associated with each category or classification of employee that is needed to perform each work activity list in response to part (i), and a complete description of the development of each loaded labor rate, including all inputs and assumptions.

(v) The probability that each work activity listed in response to part (i) will be necessary and a complete description of how these probabilities were calculated (including a list of all assumptions underlying each probability).

(vi) The estimated time required to perform each work activity listed in response to part (i), and a complete description of how these work times were calculated (including a list of all assumptions underlying each work time).

(vii) A complete listing of any non-labor costs that are included in this charge, and a detailed description of how these costs were developed. For purposes of this request, "non-labor costs" is intended to mean any cost other than direct labor costs, including but not limited to material costs, other expenses, shared costs, and common costs.

(viii) A listing of all Job Function Codes ("JFCs") associated with the labor costs included. For each JFC, provide the following for the most recent time period available:

- "Direct Labor – Productive" Annual Dollars
- "Direct Labor – Premium" Annual Dollars
- "Direct Labor – Other Employee" Annual Dollars
- "Direct Labor – Annual Paid Absence" Annual Dollars
- "Direct Labor – Direct Administration" Annual Dollars
- "Direct Labor – Other Cost" Annual Dollars
- "Directly Assigned Benefits" Annual Dollars
- Total Annual Hours

(ix) For each JFC identified in response to part (viii), provide BellSouth's projected level of labor inflation and state the time period for which this projection applies.

(x) A functioning copy of all cost models, electronic spreadsheets, or other electronic files used by BellSouth to develop these costs. These files should contain the inputs and assumptions used by BellSouth in its most recent cost analysis.

(c) If any FCC tariffed rate identified in BellSouth's response to this request is not based on TELRIC, describe in detail all conceptual and methodological differences, differences to inputs and assumptions, and any other differences between the basis for the FCC tariffed rate and a TELRIC-based rate.

56. Other than the rates or rate elements identified in the previous request, identify any and all rates or rate elements from BellSouth's interstate tariff that BellSouth seeks to include, by reference, in its interconnection agreement with DeltaCom. For each FCC tariffed rate or rate element identified, indicate whether the rate is cost-based.

(a) For any rate or rate element that BellSouth does not contend is cost-based, describe in detail the basis for this charge and explain how the rate was developed.

(b) Provide a copy of any and supporting documentation provided to the FCC by BellSouth when the rates or rate elements were filed that was intended to support the reasonableness of the rate. To clarify, DeltaCom is seeking all support for the specific rates that BellSouth seeks to reference in the interconnection agreement with DeltaCom, and is not seeking a copy of the support for all other proposed rates that may have been included in the same FCC filing.

(c) Did the FCC initiate an investigation of these rates? If no, provide a complete explanation of why BellSouth believes the rates are reasonable. If yes, provide a citation to the FCC's investigation.

(d) If the answer to part (c) is yes, describe in detail BellSouth's understanding of the standard applied by the FCC when conducting this investigation.

(e) For each rate or rate element that BellSouth contends is cost-based, indicate the type of cost (e.g. TELRIC, embedded cost, other) that BellSouth contends that the rate represents.

(f) For each rate or rate element that BellSouth contends is cost-based provide the following information:

(i) a complete description of all work activities that must be performed by BellSouth as a direct result of BellSouth performing the functionality and tasks associated with the FCC tariffed rate.

(ii) a complete explanation of why each work activity listed in response to part (i) is necessary and must be performed.

(iii) a description of each category or classification of employee that is needed to perform each work activity list in response to part (i).

(iiii) the loaded labor rate associated with each category or classification of employee that is needed to perform each work activity list in response to part (i), and a complete description of the development of each loaded labor rate, including all inputs and assumptions.

(v) The probability that each work activity listed in response to part (i) will be necessary and a complete description of how these probabilities were calculated (including a list of all assumptions underlying each probability).

(vi) The estimated time required to perform each work activity listed in response to part (i), and a complete description of how these work times were calculated (including a list of all assumptions underlying each work time).

(vii) A complete listing of any non-labor costs that are included in this charge, and a detailed description of how these costs were developed. For purposes of this request, "non-labor costs" is intended to mean any cost other than direct labor costs, including but not limited to material costs, other expenses, shared costs, and common costs.

(viii) A listing of all Job Function Codes ("JFCs") associated with the labor costs included. For each JFC, provide the following for the most recent time period available:

- "Direct Labor – Productive" Annual Dollars
- "Direct Labor – Premium" Annual Dollars
- "Direct Labor – Other Employee" Annual Dollars
- "Direct Labor – Annual Paid Absence" Annual Dollars
- "Direct Labor – Direct Administration" Annual Dollars
- "Direct Labor – Other Cost" Annual Dollars
- "Directly Assigned Benefits" Annual Dollars
- Total Annual Hours

(ix) For each JFC identified in response to part (viii), provide BellSouth's projected level of labor inflation and state the time period for which this projection applies.

(x) A functioning copy of all cost models, electronic spreadsheets, or other electronic files used by BellSouth to develop these costs. These files should contain the inputs and assumptions used by BellSouth in its most recent cost analysis.

(c) If any FCC tariffed rate identified in BellSouth's response to this request is not based on TELRIC, describe in detail all conceptual and methodological differences, differences to inputs and assumptions, and any other differences between the basis for the FCC tariffed rate and a TELRIC-based rate.

57. Identify any and all rates or rate elements from BellSouth's intrastate tariff that BellSouth seeks to include, by reference, in its interconnection agreement with DeltaCom. For each rate or rate element identified, indicate whether the rate is cost-based.

(a) For any rate or rate element that BellSouth does not contend is cost-based, describe in detail the basis for this charge and explain how the rate was developed.

(b) Provide a copy of any and supporting documentation provided to the Authority by BellSouth when the rates or rate elements were filed that was intended to

support the reasonableness of the rate. To clarify, DeltaCom is seeking all support for the specific rates that BellSouth seeks to reference in the interconnection agreement with DeltaCom, and is not seeking a copy of the support for all other proposed rates that may have been included in the same filing with the Authority.

(c) Did the Authority initiate an investigation of these rates? If no, provide a complete explanation of why BellSouth believes the rates are reasonable. If yes, provide a citation to the Authority's investigation.

(d) If the answer to part (c) is yes, describe in detail BellSouth's understanding of the standard applied by the Authority when conducting this investigation.

(e) For each rate or rate element that BellSouth contends is cost-based, indicate the type of cost (e.g. TELRIC, embedded cost, other) that BellSouth contends that the rate represents.

(f) For each rate or rate element that BellSouth contends is cost-based provide the following information:

(i) a complete description of all work activities that must be performed by BellSouth as a direct result of BellSouth performing the functionality and tasks associated with the tariffed rate.

(ii) a complete explanation of why each work activity listed in response to part (i) is necessary and must be performed.

(iii) a description of each category or classification of employee that is needed to perform each work activity list in response to part (i).

(iiii) the loaded labor rate associated with each category or classification of employee that is needed to perform each work activity list in response to part (i), and a complete description of the development of each loaded labor rate, including all inputs and assumptions.

(v) The probability that each work activity listed in response to part (i) will be necessary and a complete description of how these probabilities were calculated (including a list of all assumptions underlying each probability).

(vi) The estimated time required to perform each work activity listed in response to part (i), and a complete description of how these work times were calculated (including a list of all assumptions underlying each work time).

(vii) A complete listing of any non-labor costs that are included in this charge, and a detailed description of how these costs were developed. For purposes of this request, "non-labor costs" is intended to mean any cost other than direct labor costs,

including but not limited to material costs, other expenses, shared costs, and common costs.

(viii) A listing of all Job Function Codes ("JFCs") associated with the labor costs included. For each JFC, provide the following for the most recent time period available:

- "Direct Labor – Productive" Annual Dollars
- "Direct Labor – Premium" Annual Dollars
- "Direct Labor – Other Employee" Annual Dollars
- "Direct Labor – Annual Paid Absence" Annual Dollars
- "Direct Labor – Direct Administration" Annual Dollars
- "Direct Labor – Other Cost" Annual Dollars
- "Directly Assigned Benefits" Annual Dollars
- Total Annual Hours

(ix) For each JFC identified in response to part (viii), provide BellSouth's projected level of labor inflation and state the time period for which this projection applies.

(x) A functioning copy of all cost models, electronic spreadsheets, or other electronic files used by BellSouth to develop these costs. These files should contain the inputs and assumptions used by BellSouth in its most recent cost analysis.

(c) If any FCC tariffed rate identified in BellSouth's response to this request is not based on TELRIC as implemented by this Authority, describe in detail all conceptual and methodological differences, differences to inputs and assumptions, and any other differences between the basis for the FCC tariffed rate and this Authority's implementation of TELRIC.

58. Has BellSouth ever requested that ITC^DeltaCom resend CFA information? If yes, provide a listing of each such occasion.

59. Has BellSouth ever requested that any other CLEC with whom BellSouth has an interconnection agreement resend CFA information?

(a) If yes, provide a complete listing of all CLECs from whom BellSouth has requested a resend of CFA information.

(b) Have any of the CLECs listed in BellSouth's response to part (a) ever refused to resend CFA information when BellSouth has requested such a resend?

(c) If the answer to part (b) is anything other than an unqualified no, provide a complete listing of all CLECs that have refused such a request.

60. Provide a copy of BellSouth's most current cost analysis of the charge to resend a

CFA. Include the following information in your response:

(i) a complete description of all work activities that must be performed by BellSouth as a direct result of BellSouth performing the functionality and tasks associated with the resend of CFA information.

(ii) a complete explanation of why each work activity listed in response to part (i) is necessary and must be performed.

(iii) a description of each category or classification of employee that is needed to perform each work activity list in response to part (i).

(iiii) the loaded labor rate associated with each category or classification of employee that is needed to perform each work activity list in response to part (i), and a complete description of the development of each loaded labor rate, including all inputs and assumptions.

(v) The probability that each work activity listed in response to part (i) will be necessary and a complete description of how these probabilities were calculated (including a list of all assumptions underlying each probability).

(vi) The estimated time required to perform each work activity listed in response to part (i), and a complete description of how these work times were calculated (including a list of all assumptions underlying each work time).

(vii) A complete listing of any non-labor costs that are included in this charge, and a detailed description of how these costs were developed. For purposes of this request, "non-labor costs" is intended to mean any cost other than direct labor costs, including but not limited to material costs, other expenses, shared costs, and common costs.

(viii) A listing of all Job Function Codes ("JFCs") associated with the labor costs included. For each JFC, provide the following for the most recent time period available:

- "Direct Labor – Productive" Annual Dollars
- "Direct Labor – Premium" Annual Dollars
- "Direct Labor – Other Employee" Annual Dollars
- "Direct Labor – Annual Paid Absence" Annual Dollars
- "Direct Labor – Direct Administration" Annual Dollars
- "Direct Labor – Other Cost" Annual Dollars
- "Directly Assigned Benefits" Annual Dollars
- Total Annual Hours



(ix) For each JFC identified in response to part (viii), provide BellSouth's projected level of labor inflation and state the time period for which this projection applies.

(x) A functioning copy of all cost models, electronic spreadsheets, or other electronic files used by BellSouth to develop these costs. These files should contain the inputs and assumptions used by BellSouth in its most recent cost analysis.

61. When does the Cancellation Charge apply?

a). Identify any cost studies, cost analysis or other files used by BellSouth to develop the costs for the Cancellation Charge.

62. Describe or explain how BellSouth's operator will reach a ITC^DeltaCom operator or customer in an emergency situation and in a busy line interrupt or busy line verification situation.

63. Please provide BellSouth's uncollectibles for CLEC billing for 2000, 2001 and 2002.

64. Please provide BellSouth's uncollectibles for CLEC billing as a percent of total CLEC billing and as a percent of total billing for 2000, 2001 and 2002.

65. Please provide BellSouth's uncollectibles for CLEC billing as a percent of total CLEC billing and as a percent of total billing for 2000, 2001 and 2002. 64. Please provide the total number of CLEC's served by BST, the number that have paid a deposit to BST, the number who have been requested to pay a deposit, the sum of the number who have paid a deposit or have a deposit request pending at this time.

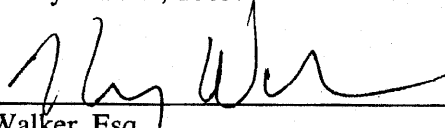
66. Please provide the total number of retail business customers of BST, the number who have paid a deposit to BST, the number who have been requested to pay a

deposit, and the sum of the number who have paid a deposit or have a deposit request pending at this time.

67. Does BST apply the same deposit criteria to its retail business customers that it applies to its CLEC customers?
68. Please provide the deposit requirement guidelines for retail business customers and the guidelines used to determine the amount of deposit for retail business customers.
69. How do the BST wholesale/CLEC credit managers coordinate with the BST retail credit managers coordinate deposit policy to ensure nondiscrimination between wholesale and retail customers?
70. What is BST's policy relative to waiving deposit requirements for CLECs in return for a CLEC 's agreement to acquiesce on some other contract or operational issue or issues?
71. Have there been any instances where BellSouth agreed to waive or reduce the amount of a deposit demanded of a CLEC in conjunction with or in return for a CLEC's agreement to change its position on some other contract issue, operational issue, billing dispute, regulatory position or legislative position?
72. List all locations in Tennessee where Bellsouth and any CLEC or ILEC have interconnected at points other than a collocation site for dark fiber loop and/or dark fiber transport.
73. Identify in detail each circumstance where BellSouth intends to assess a Subsequent Application Fee.

74. Identify in detail each circumstance where Bellsouth intends to assess the Administrative Only Fee.
75. When BellSouth changes an end user's preferred provider in error, does BellSouth contact (a) the preferred provider and inform that carrier of the error and (b) does BellSouth inform the affected end user of BellSouth's error?
76. Has BellSouth ever changed an end user's preferred provider in error and corrected that error without contacting the affected end user?
77. Does BellSouth retail use the service order FID OIO ?
- a). Describe the circumstances when BellSouth uses this FID.
  - b). Are subscribers notified?
  - c). Is billing to the subscriber affected?
78. Does BellSouth use the FID ETET? (a) What is the purpose of this FID? (b) Describe the process for using ETET?

Respectfully submitted this 12<sup>th</sup> day of June, 2003.



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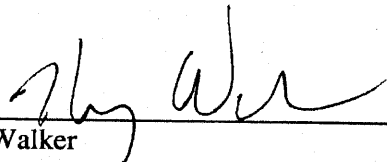
*Attorneys for ITC^DeltaCom Communications, Inc.*

**CERTIFICATE OF SERVICE**

This is to certify that I have this day caused to be served by United States mail a copy of the within and foregoing, **ITC^DELTACOM COMMUNICATIONS, INC.'S FIRST SET OF INTERROGATORIES TO BELL SOUTH** upon the following person, properly addressed as follows:

Guy M. Hicks  
333 Commerce Street, Suite 2101  
Nashville, TN 37201-3300

This 12<sup>th</sup> day of June, 2003.

  
Henry Walker

June 24, 2003

Re: Docket 03-00119

Sharla Dillon:

Joe Werner, the Pre-Arbitration Officer requested that this be placed in the docket file.

  
Carsie Mundy

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